

**RESPONSE TO INTERROGATORY NO. 34:**

At the appropriate time, Purdue will identify its witnesses and experts and provide related discovery as outlined in the Kentucky Rules of Civil Procedure and/or any order of the Court. Purdue objects to this Interrogatory to the extent it can be construed to ask for expert-related information that is beyond the proper scope of such discovery.

**INTERROGATORY NO. 35:**

State with specificity each and every exhibit which you intend to use in the trial of this action, as well as each and every item of demonstrative evidence which you intend to use for illustrative purposes.

**RESPONSE TO INTERROGATORY NO. 35:**

At this time, Purdue does not know what documents it will offer at trial. Therefore, Purdue objects to this Interrogatory on the grounds that it is premature. Discovery is ongoing, and this Interrogatory is dependent upon information that may be developed through the course of discovery. At the appropriate time, Purdue will comply with any order of the Court regarding the identification of exhibits.

**INTERROGATORY NO. 36:**

Please state the number of sales representatives assigned to each and every county, area and/or region of Kentucky who promoted, marketed and/or detailed OxyContin for each year that OxyContin was on the market.

**RESPONSE TO INTERROGATORY NO. 36:**

Purdue lists below the sales representatives who promoted, marketed and/or detailed OxyContin to healthcare professionals in Kentucky for the relevant time period.

<b>LastName</b>	<b>FirstName</b>	<b>StartDate</b>	<b>End Date</b>
Abernathy	Marla S	8/1/2000	10/18/2002

Backiewicz	Brian	7/1/2004	7/1/2004
Backs	Diane	10/1/1995	10/14/1998
Baird	Susan M	3/14/2006	8/16/2007
Bontrager	Lyle	7/1/2004	6/30/2005
Boyles	Kimberly	5/28/1996	1/6/2000
Breetz	Deborah	8/27/2001	4/2/2002
Bright	Emily Dooley	7/10/2000	1/7/2002
Bullock	John R	9/23/1996	6/30/1999
Carnes	Patricia	3/4/1998	7/9/2000
Conner	Brent M	4/27/1992	9/30/1996
Copeland	Robert C	5/3/2004	2/28/2006
Couch	Joel E	6/20/2003	6/9/2004
Curran	Mark A	1/1/1999	1/22/2001
Day	Rhonda H.	9/5/2000	4/19/2004
Drook	Katherine A	7/9/2002	6/30/2004
Dunleavy	Kevin	1/6/2000	12/31/2002
Farmer	Lori	3/1/2000	7/21/2000
Fase	Amy J	2/9/2001	4/2/2002

Fedorovich	Todd A	7/1/2004	7/1/2004
Foster	Shane K	7/1/2004	7/1/2004
Franklin	Archie C	3/1/2000	6/30/2004
Furman	Frederic	7/1/1999	6/30/2005
Goodwin	Angela A	8/20/2004	9/8/2004
Grandominico	Christy M	1/1/2000	6/9/2004
Gross	Philip R	1/5/1998	11/7/2003
Guillerman	Ann M	5/25/2001	7/23/2001
Hayes	Robyn H	7/10/2000	5/20/2003
Herring	David C	7/20/2001	4/25/2005
Heuke	Shawn Marie	9/23/1996	6/2/2003
Heydel	Steve	1/1/1991	10/2/1997
Honnerlaw	Amy G	5/31/2005	6/30/2005
Hook	Craig	1/1/1996	4/13/2008
Hoover	Chaundra L	5/22/2000	6/30/2002
Hosick	Steven K	7/1/1999	6/9/2004
Hunt	M Joseph	7/16/1999	6/18/2001
Ihnen	Kelly	9/26/2007	4/13/2008

Irvine	Matthew	4/15/2002	3/31/2006
Julian	Natasha A	2/12/2003	6/30/2004
Keith	Kimberly B	7/6/1992	6/30/2004
Kenney	James P	11/9/1998	9/30/2001
Killion	Laura E	4/7/2000	6/30/2004
Kincer	Gregory L	2/20/2003	6/30/2005
Knight	Sarah	9/9/2004	6/30/2005
Laird	Sendi K	9/4/2001	5/26/2004
Leach	Linda	7/1/1999	7/3/2000
Liston	JoAnn	10/23/2001	6/9/2004
Mac	Margaret T	7/15/2002	10/13/2003
Mahoney	Angela M	10/10/2000	5/17/2004
Manning	Mark A	7/24/2000	7/31/2000
Martinez	Linda	1/1/1996	10/4/1996
Maudlin	Karen	10/9/2000	1/31/2001
McCowan	Christopher	9/27/1999	4/13/2008
Miller	Terry L	5/24/2002	5/30/2002
Morgan	John D	12/30/2003	7/7/2004

Mueller	Sue Anne	12/2/1996	12/13/1996
Neiheisel	Carol	7/19/1999	4/13/2008
Neiheisel	Carol	7/1/2004	6/30/2005
Oca	Marc	4/22/1997	4/13/2008
Powell	Daniel T	10/18/2004	6/30/2005
Radcliffe	Mark T	1/22/1996	12/31/1997
Roberts	Andrew W	6/19/2003	7/20/2004
Romagna	Kerri L	1/2/2003	6/30/2004
Rossi	Stephen V	10/1/1995	9/30/1996
Scott	Misty S	9/9/2004	6/30/2005
Sheets	Barbara	10/2/1995	6/30/1999
Smith	James C	7/6/2001	7/16/2004
St Pere	Bryan E	4/28/2004	5/14/2004
Steckler	Chet	8/1/2007	4/13/2008
Thomaskutty	Champ C	7/29/2003	2/20/2007
Tolley	Alexandria M.	1/1/1991	5/1/2003
Turner	Micheal S	8/8/2003	4/19/2004
Warren	Julie D	2/10/2000	12/30/2002

Waugh	Jeffrey	1/1/1999	9/30/2010
Wethington	John	4/14/1998	5/31/2003
White	April L	12/20/2002	6/30/2004
Will	Holly	1/1/1996	3/15/2001
Wood Jr	Richard E	6/28/1993	6/30/2005

**INTERROGATORY NO. 37:**

For each and every sales representative to whom Interrogatory No. 36 applies and for each year that OxyContin was on the market, please state that sales representative's name, address, phone number, gross sales of OxyContin, average sales of OxyContin and bonuses awarded for OxyContin sales.

**RESPONSE TO INTERROGATORY NO. 37:**

Purdue objects to this Interrogatory because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections and its General Objections, please see documents produced in response to Requests for Production of Documents.

**INTERROGATORY NO. 38:**

In addition to the information provided in Interrogatory No.37, and for each and every sales representative to whom Interrogatory No. 36 applies, please state each and every sales representative's gross sales, average sales and bonuses awarded for each and every pharmaceutical product promoted, marketed and/or detailed by that sales representative.

**RESPONSE TO INTERROGATORY NO. 38:**

Purdue objects to this Interrogatory on the grounds that it is neither relevant to the claims or defenses of any party in this matter nor reasonably calculated to lead to the discovery or admissible evidence in that it seeks information related to other products besides OxyContin. Subject to and without waiving the foregoing objections and its General Objections, please see